

# **FAQ Iowa 4-H Information Sharing**

## Is the approval to share information a change in practice?

No. The guidance in the Information Sharing document simply formalizes long-standing practice of sharing appropriate information with program partners for the purpose of conducting 4-H educational programming.

# Does this guidance conflict with previous "mailing list" regulations that said extension mailing lists were not to be distributed?

No. The previous mailing list guidance was based on old penalty mail regulations that is over twenty years old. The language for that guidance is no longer current. Federal regulations now say that mailing lists may not be sold or rented. We are not selling or renting mailing list, nor are we giving approval to provide all information collected as part of 4-H enrollment.

# So we can now distribute mailing lists?

No. We are not talking about sharing complete lists and complete (identifiable and personal) information collected on individuals or families. We are talking about sharing the minimum needed information with a program partner so that partner can assist in carrying out extension work. The guidance also states that information will only be shared when a formal agreement is in place. The agreement will also specify how the information is to be used.

#### Has this guidance been approved by legal counsel?

The guidance has been shared with and reviewed by the Iowa State University Office of University Counsel.

#### Can you provide examples for county fairs?

Yes. If the county fair board is responsible for distributing premium checks to exhibitors, they need names and addresses of exhibitors to send the checks. If the beef committee is preparing stall cards or show programs, the committee needs access to exhibitor

names, animal information, and likely club names to complete those tasks. Exhibitors at fairs have chosen to participate in a public setting.

Most county fairs include an exhibit tag that includes the name of 4-H member, their 4-H club, often a grade in school or age, and exhibit description. At that point, you've already made that information public. Provide the information to partners and volunteers as needed to accomplish the tasks of managing the fair.

### Can volunteers have access to information in FairEntry (or other entry program)?

Yes if the access and information is needed for their volunteer assignment. For example, it would be appropriate for the swine committee to have access to swine exhibitor entry information to enter animal weights, break classes, create show programs, and enter results.

At the Iowa State Fair, department superintendents and other volunteers are provided access to the FairEntry system to check-in exhibits, edit exhibit descriptions, change classes if necessary, enter results, and generate reports needed for their departments. We have not had any issues or concerns with allowing this access.

# Should we be concerned about confidentiality of other information in a database when access is allowed?

Of course. Anyone with access to information collected as part of enrollment or event registration should be instructed on procedures and policies to keep information confidential, and only share information in accordance with policy, partnership agreements, or other directives. We recommend that all volunteers with access to personal information sign and agree to the provisions in the "4-H Leader/Volunteer Services Confidentiality Statement" (4-H 2DD)

## Are there non-fair examples when information sharing might be appropriate?

One example would be shared programs. Perhaps a science discovery workshop is jointly planned and conducted by Extension and the local library. A partnership agreement could include sharing registration information with both entities in order to inform participants and families of future programming opportunities.

Consider also what information you (Extension) would like (or need) to receive from program partners. Partners expect the same from us. Reciprocal sharing of information for joint programming is expected.

### Should we tell people that we might share their information?

It is always best practice to inform participants how we use personal information that we collect as part of enrollment or program registration. An easy way to do this for fair exhibitors is to include a disclaimer as part of the fair entry process. Consider using language similar to: By making entry into XYZ fair, I understand that entry information will be available to (list partners) for the purpose of managing fair events, distributing premiums, (etc.).

That alerts anyone making an entry that their information will be shared, who it is shared with, and for what purposes. Similar language could be used in program registration materials for partner programs. If not possible to inform individuals at the time of program registration/exhibit entry, notice can be provided (prior to sharing the information) to individuals of the intent to share information, what information will be shared, and for what purpose. Recommended best practice when using this method is to allow individuals the opportunity to opt out of having their information shared.

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